

MEMORANDUM
VIA FAX

TO: ALICE FUERST
EPA REGION 7

FROM: NEIL GEITNER
CH2M HILL

DATE: 4 MAY 1989

SUBJECT: CHEROKEE COUNTY
GALENA SUBSITE
ACTION ITEMS FOR COMPLETION OF GW/SW OUFS SUPPLEMENT
DEN 66541.PM EPA WA 102-7L37

In accord with our telecon yesterday, I am transmitting to you the following list of current action items that we need feedback from you to expedite completion of the OUFS supplement on your current schedule which as we understand it is:

1. Late May early June- have next draft to EPA for review and comment
2. End of June have completed document in EPA possession

Alice, it now appears that the preliminary (without CLP results) field pilot test work will be started on May 15, 1989 and be complete by the end of June. If you want to include these results in the preferred plan, then the comment period should start no earlier than mid-July. This will allow two weeks for the documentation and interpretation of the batch and flow-through pilot tests. Alice, we are assuming that the funds in WA 223 will be used to prepare a short technical memo on the results of the pilot program.

What is your drop dead date for the ROD? The fiscal year ends on September 29, 1989. If the ROD is in complete draft form by September 1, 1989 can we make a September 29, 1989 finalization date?

ACTION ITEMS

The following action items are the current needs.

1. We have called the document a supplement to the previous OUFS. Is this satisfactory?
2. For the above submission, how many copies will you require? What are the internal review schedules and meetings? We will need approximately 2 weeks.



finalize the document to be ready for reproduction following receipt of comments. Do you intend for us to do any major reproduction of the submittals or will we need to give your staff time for reproductions.

3. EPA needs to provide us final guidance on the action levels for lead (Pb). We have discussed alternatively 700, 750 and 1,000 ppm. The action level has a direct bearing on the amounts of materials handled in the various alternatives and the water quality impacts.
4. We need also some final guidance from you on the unit-cost per acre for top soil, soil amendments and reseeded that the Agency sees associated with the revegetation being considered in the OUFs. You have previously indicated that \$1,000 per acre was to be used. Is this still the value that we are to use in our cost estimates?
5. At our April 11, 1989 meeting we presented a modified testing program for determining the lead levels in the chat piles. The purpose of this program was to eliminate the need for physical screening of the chat in potentially large quantities. In your April 11 meeting notes you discussed this revised testing program but did not say that the Agency had yet accepted the program. We need a decision to progress with the alternative definitions, costing, and effects evaluation.
6. We need your concurrence on the final list of alternatives to be included in the OUFs supplement. We propose to eliminate alternatives 4 and 5 from the current revised draft document. This will leave us with:
 1. No Action
 2. Mine and mill all mine wastes (waste rock and chat)
 3. Mine and mill waste rock only
 4. Mine and dispose of all mine wastes in an on-site containment facility
 5. Determine metal contents, selectively backfill and recontour (PRP alternative)
 6. Geochemically characterize, segregate by particle size, selectively backfill and recontour. (Modified PRP alternative)

All the above alternatives contain recontouring, revegetation, deep well remediation, and rechannelization. The recontouring and revegetation will vary depending on the amount of materials moved in each alternative and the remaining materials on the

local areas for recontouring.

We also need to look carefully and decide on the names for the alternatives.

The PRP alternative needs to be retained in the OUFS supplement for analytical completeness and documentation on the steps in the intervening time since the completion of the OUFS last Spring.

Alternatives 4 and 5 from the previous draft are no longer needed. Their initial purpose was to show a variance in the costs due to the quantities of materials being handled.

We recommend that the flyash-bottom ash addition to the backfilling not be included in the FS supplement at this time. It will cost considerably more due to the hauling and mixing and would provide no benefits if the pilot tests clearly demonstrate the adequacy of the backfill alternative. We should only consider this remedy as a fallback in the unlikely event of poor pilot test results.

BUDGET NEEDS

You also asked for our approximate estimates for budgetary modifications needed to support the anticipated activities. We have organized the budget numbers by approximate groupings and are in the process of preparing a detailed WPRR to cover these activities.

<u>Activity</u>	<u>Budget Estimate</u>
Finish OUFS Supplement (next draft, final, limited reproductions(30 copies))	\$ 25,000 to 35,000
Project Management (July thru Sept 1989)	\$ 20,000 to 25,000
Post OUFS Support (Resp Summary assist. ROD Assist, Negot assist)	\$ 20,000 to 35,000
Subtotal	\$ 65,000 to 95,000

